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**VIA HAND DELIVERY**

November 4, 1999

Magalie Roman Salas, Esq.  
Federal Communications Commission  
445 Twelfth Street, SW Suite TWA-325  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

- RE:**
- o *Clarification of the Commission's Rules on Interconnection Between LECs and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")
  - o Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, *First Report & Order*, CC Docket Nos. 96-98, 95-185 ("Local Competition First Report & Order")
  - o *Formal Complaint of TSR Paging Inc. against US West Communications Inc.*, File No. E-98-10 (filed December 24, 1997)
  - o *Formal Complaint of Metrocall against Various LECs*, File Nos. E-98-14-18 (filed January 20, 1998)
  - o *Formal Complaint of USA Mobile Communications, Inc. II against CenturyTel of Ohio, Inc.*, File No. E-98-38 (filed May 1, 1998)
  - o *Formal Complaint of Arch Communications Group, Inc. against U S WEST Communications, Inc.*, File No. E-99-05 (filed December 3, 1998)
  - o *Formal Complaint of Arch Communications Group, Inc. against BellSouth Telecommunications, Inc.*, File No. E-99-06 (filed December 7, 1998)
  - o *Formal Complaint of MAP Mobile Communications, Inc. against US West Communications, Inc.* File No. E-99-11 (filed March 4, 1999)



Personal  
Communications  
Industry  
Association

**Notice of *Ex Parte* Presentation**

Dear Ms. Salas:

This is to notify you that Angela E. Giancarlo and Robert L. Hoggarth of the Personal Communications Industry Association ("PCIA") together with Carl W. Northrop of Paul Hastings Janofsky & Walker, LLP met with Christopher Wright, General Counsel of the Federal Communications Commission, and John Ingle and Dan Harrold of Mr. Wright's staff, on November 3, 1999. Our discussion focused on procedural and substantive issues related to LEC-paging interconnection and therefore should be noted for the above-referenced dockets.

I have attached a listing of handouts that I provided to Messrs. Wright, Ingle and Harrold. Each of these documents is already on record with your office in the above-referenced dockets.

Magalie Roman Salas, Esq.

November 4, 1999

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Pursuant to §1.1206(b) of the Commission's rules, two copies of this letter for each of the above-referenced dockets (a total of sixteen copies) are hereby filed with the Secretary's office. Copies of this letter are also being sent to the Commission staff listed below.

Kindly refer questions in connection with this matter to me at 703-535-7487.

Respectfully submitted,

A handwritten signature in cursive script that reads "Angela E. Giancarlo". The signature is fluid and written in dark ink.

Angela E. Giancarlo, Esq.

Director, Federal Regulatory Affairs

Attachment

cc: Dan Harrold, Esq.  
John Ingle, Esq.  
Christopher Wright, Esq.

## **Meeting Materials**

**Presented to Christopher J. Wright, Esq.**

**Presented by the Personal Communications Industry Association**

**November 3, 1999**

### **Dockets:**

- o *Clarification of the Commission's Rules on Interconnection Between LECs and Paging Carriers*, CCB/CPD No. 97-24 ("SWBT clarification request")
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## **Listing of Attachments**

1. Letter from Richard Metzger, Chief, Common Carrier Bureau, Federal Communications Commission to Mr. Keith Davis, Southwestern Bell Telephone *et al.*, DA 97-2726 (Dec. 30, 1997) ("Metzger Letter").
2. *In re Request for Clarification of the Commission's Rules Regarding Interconnection Between LECs and Paging Carriers*, Opposition of the Personal Communications Industry Association to the Petition for Stay, CCB/CPD Docket No. 97-24 (Feb. 10, 1998).
3. *In re Request for Clarification of the Commission's Rules Regarding Interconnection Between LECs and Paging Carriers*, Opposition of the Personal Communications Industry Association to the Applications for Review (corrected copy), CCB/CPD Docket No. 97-24 (Feb. 24, 1998).
4. Letter from Angela E. Giancarlo, Esq., Personal Communications Industry Association, to Magalie Roman Salas, Esq., Federal Communications Commission, regarding LEC-paging interconnection issues (Mar. 17, 1998) (provides evidence that the entitlement of paging carriers to terminating compensation was specifically addressed in the appeal to the Eighth Circuit of the *Local Competition First Report & Order* and was resolved in favor of the paging companies).
5. Letter from Robert L. Hoggarth, Esq. and Angela E. Giancarlo, Esq., Personal Communications Industry Association, to Magalie Roman Salas, Esq., Federal Communications Commission, regarding LEC-paging interconnection issues (May 4, 1999) (specifically addresses and rejecting contentions advanced by SBC Communications that paging carriers are entitled to neither relief from facilities charges nor to terminating compensation and contains excerpts from PCIA's *amicus curiae* brief filed with the United States Court of Appeals for the Ninth Circuit in *Pacific Bell v. Cook Telecom Inc.*, Case No. 98-16951).
6. Presentation to the Federal Communications Commission by Michael L. Katz, economic consultant to PCIA, entitled *Economically Rationally Interconnection: Reciprocal Compensation for Paging Carriers* (June 23, 1999).